

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

FRALEG GROUP, INC.,

Chapter 7

Case No.: 22-41410-jmm

Debtor.

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**APPLICATION FOR THE RETENTION OF CERTILMAN BALIN ADLER & HYMAN,
LLP, AS ATTORNEYS FOR THE TRUSTEE**

TO: THE HONORABLE JIL MAZER-MARINO
UNITED STATES BANKRUPTCY JUDGE
EASTERN DISTRICT OF NEW YORK

The Application of Richard J. McCord, as Chapter 7 Trustee of the above-captioned Debtor respectfully represents as follows:

1. On June 17, 2022 (“Petition Date”), Fraleg Group, Inc. (the “Debtor”) filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.

2. On December 18, 2023, the case was converted to one under Chapter 7, and on December 19, 2023 (the “Appointment Date”), Richard J. McCord was appointed Trustee for the Estate of the Debtor and is now qualified to act as such Trustee.

3. As Trustee, I submit this Application to retain the law firm of Certilman Balin Adler & Hyman, LLP (“Certilman”), as counsel for the Trustee, as of the Appointment Date, given their experience representing Chapter 7 Trustees. I am also a member of Certilman.

4. This Application is made pursuant to 11 U.S.C. §327(a) and E.D.N.Y LBR 2014-1 which requires that an attorney be retained by Order of this Court.

5. Jaspreet S. Mayall, Esq., and I as members of Certilman, have had extensive experience in Bankruptcy related proceedings. We and our associates are needed to assist the Trustee in effectively liquidating the estate, particularly in the areas of unlawful and improper transfers which may have been made during the course of bankruptcy, as well as the general

representation of the Trustee before the Bankruptcy Court. Their experience will streamline and effectuate a quick resolution of the case and will allow the Trustee to maximize the assets of the estate for the benefit of creditors.

6. To the best of applicant's knowledge, Certilman has had no connection with the Debtor or any other party affiliated or connected with the Debtor or its attorney as set forth in the annexed affirmation of Richard J. McCord Esq., a member of Certilman, and is a disinterested person as defined in 11 U.S.C. §101(14).

7. The Trustee desires to retain counsel because of the extensive legal services which I believe will be required with regard to the Debtor's business, including but not limited to, reviewing books and records for said business, review all documents pertaining to the debtors real property located 116 North Walnut Street, East Orange, New Jersey 07017 (the "Real Property"), if the Trustee proceeds with the sale of the Real Property, prepare the contract of sale, prepare any sale Motions to be filed with the Court and represent the Trustee in all matters pertaining to the Real Property, submission of applications for 2004 examinations and conducting said 2004 examinations, commencing any potential actions, and represent the Trustee in all litigation that may arise during the administration of the Estate. Compensation to said firm will be made upon proper application to the Bankruptcy Court in accordance with the provisions of the Bankruptcy Code.

8. For the reasons set forth in the accompanying Affirmation of Richard J. McCord, Esq. it is respectfully requested that the retention of Certilman be as of the Appointment Date.

9. No prior application for the relief herein requested has been made to this or any other Court of competent jurisdiction.

WHEREFORE, Applicant respectfully requests that the Trustee be authorized to retain Certilman, to represent him in this proceeding under Chapter 7 of the Bankruptcy Code, together with such other and further relief as to this Court may seem just and proper under the circumstances.

Dated: East Meadow, New York
December 20, 2023

/s/ Richard J. McCord
RICHARD J. MCCORD, ESQ.
CHAPTER 7 TRUSTEE
90 Merrick Avenue
East Meadow, New York 11554
516-296-7000